

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WHEELER ZAMICIELI

Plaintiff

V.

CITY OF PHILADELPHIA, et al.,

Defendants

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CIVIL NO. 12-3200

FILED

MAR 14 2013

MICHAEL L. JUNE, Clerk
By _____ Dep. Clerk

PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

Plaintiff comes on this 10th day of March, 2013, pursuant to Rule 34, of the Federal Rules of Civil Procedure, requesting the defendants, City of Philadelphia et al., produce for inspection and copying the following documents within 30 days:

1. The complete arrest and investigation reports of plaintiff, on 2/20/11, by P/O Melvin Victor and William Andrews.
2. All investigation and incident reports, including 911 calls, of the shootings that occurred on 2/20/11, prior to plaintiff's arrest by P/O Victor and Andrews.

3. The Municipal Court Preliminary Hearing Transcripts of P/O William Andrews testimony, surrounding Plaintiff 2/20/11 arrest.
4. The complete investigation, Government Adoption, and arrest reports by ATF Agent Patrick Henning, ^{sur-}rounding the arrest of Plaintiff, under Federal Indictment No. 11-393.
5. All original photographs taken by ATF Agent Henning, of Plaintiff's 2006 Chevy Impala, under Federal Indictment No. 12-182. These photographs was taken by ATF on 7/13/11.
6. The Suppression Hearing Transcripts and testimony of Melvin Victor and Andrews from the United States District Court, No. 11-393.
7. The District Court Opinion by judge Schiller, and Court Order, dismissing plaintiff's indictment, under case no. 11-393.
8. Any and all Internal Affairs complaints against P/O Melvin Victor and William Andrews, by citizens of Philadelphia, and disciplinary sanctions imposed if any.
9. Any and all Internal Affairs reports of citizens, or complaints about their rights being violated, due to the stop and frisk policy.
10. Any and all rules, regulations customs, directives, practices and policies of the City of Philadelphia, for the Phila. Police Dept.

11. Any and all training procedures and reports of the City of Philadelphia, and it's directives by Police Commissioner Charles Ramsey, to enforced the Stop and Frisk Policy.

12. Any and all regulations of the City of Philadelphia, and the Police Department, to deter Police Misconduct of Officers who violated citizens U.S. Constitutional Rights.

13. Any and all Police Inquiry Reports, of Misconduct of Officers, who enforced the Stop and Frisk Policy.

14. Any and all Civil Judgements, or out of court settlements, due to Philadelphia Police, violating citizens 4th Amendment Rights, via Stop and Frisk Policy.

15. Any and all of Defendants Insurer, insurance Policys, and the maximum liability limit for punitive damages.

DATE: MARCH 10, 2013

RESPECTFULLY SUBMITTED,

Whelan Zamichuk

IN THE UNITED STATES DISTRICT COURT
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WHEELER ZAMICHEL
Plaintiff

v.

CITY OF PHILADELPHIA, et al.,
Defendants

CIVIL ACTION NO. 12-3200

FILED
MAR 14 2013
MICHAEL A. KUNZ, Clerk
By _____ Dep. Clerk

CERTIFICATE OF SERVICE

I hereby certify that, on the date below, the foregoing Plaintiff's first request for Production of Documents, has been served upon the Clerk of Courts, and City Solicitor Dimitrios Mavroudis, by U.S. Mail prepaid as follows.

DATE: MARCH 10, 2013

RESPECTFULLY SUBMITTED,

Wheeler Zamicheli